

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Heather Dolan

Case No. Case: 2:22-mj-30108
Assigned To : Unassigned
Assign. Date : 3/1/2022
CMP USA V DOLAN (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 1, 2022 in the county of Jackson in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1)	Possession with intent to distribute controlled substances

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 1, 2022

City and state: Detroit, Michigan



Complainant's signature

Special Agent George Bingham, ATF
Printed name and title



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

v.

HEATHER DOLAN,

Defendant.

Case No.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, George Bingham, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since September 2009. Prior to this, I was a Michigan State Police (MSP) Trooper for approximately 11 years. I am a graduate of the Federal Law Enforcement Training Center (FLETC) Criminal Investigator School and ATF's Special Agent Basic Training school. I am currently assigned to the Detroit Field Division, Ann Arbor Office, where I am responsible for investigating violations of firearms laws, among other crimes. I have participated in numerous investigations involving firearms, narcotics trafficking by armed individuals, robberies, assaults, homicides, and criminal street

gangs. I have been the affiant on numerous federal search warrants and federal criminal complaints.

2. I make this affidavit from personal knowledge as well as information provided by other law enforcement officials and/or their reports and records. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all details or facts that exist pertaining to the investigation.

3. I submit this affidavit in support of a criminal complaint charging that, on or about March 1, 2022, in the Eastern District of Michigan, defendant Heather DOLAN knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

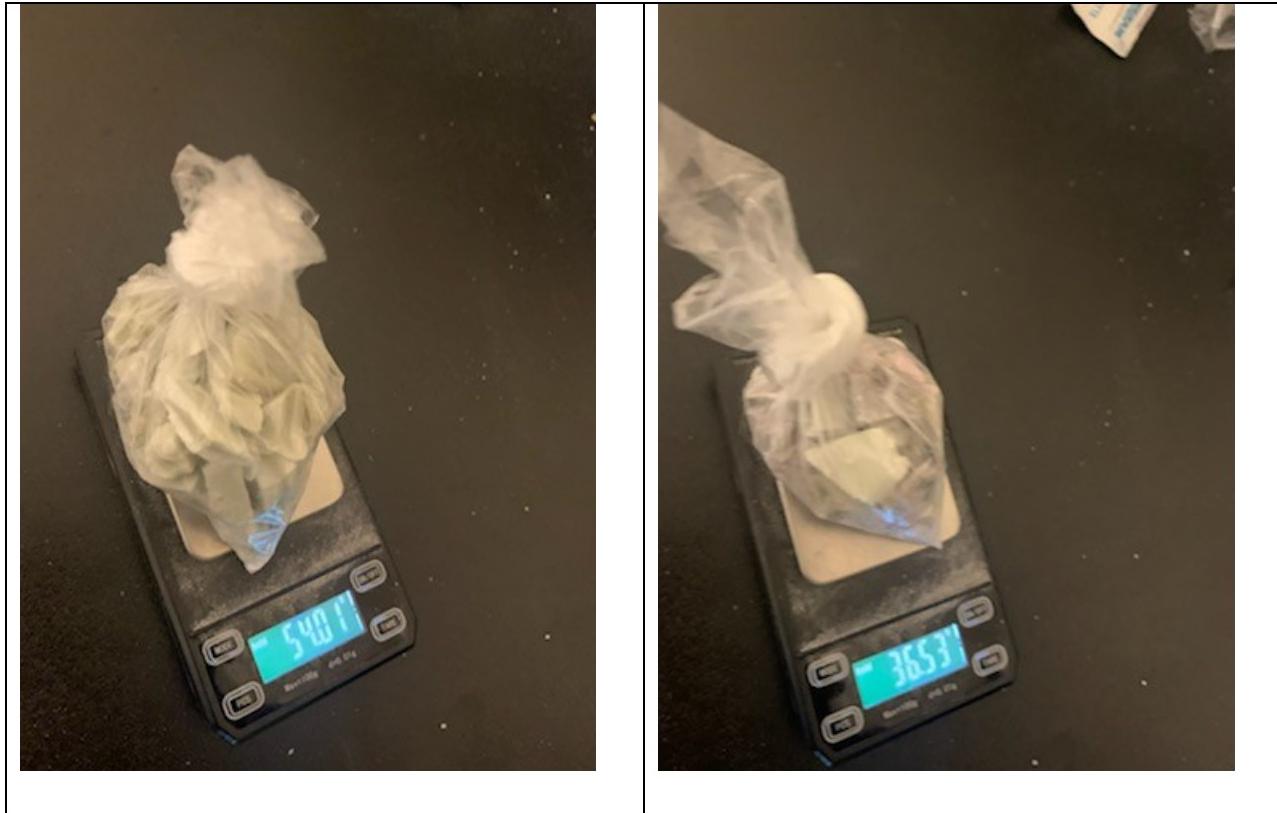
PROBABLE CAUSE

4. On the morning of March 1, 2022, ATF agents executed a federal search warrant at the residence of Heather DOLAN in Jackson, Michigan (the “TARGET RESIDENCE”), which is within the Eastern District of Michigan.

5. When agents entered the TARGET RESIDENCE, Heather DOLAN was inside. No other persons were found inside the TARGET RESIDENCE at the time of the search.

6. During the search of the TARGET RESIDENCE, agents found significant quantities of suspected controlled substances, as well as drug distribution paraphernalia.

7. Specifically, agents opened the door to a room inside the TARGET RESIDENCE and found a safe inside the closet of that room. Inside the safe (which was unlocked), agents found two baggies containing suspected narcotics. Inside each baggie were multiple, colored “rocks.” The substance was not field tested in order to protect officer safety, but based on my training and experience, I recognized this substance to likely be “cooked” or “rocked-up” fentanyl. The substances were weighed: one baggie was approximately 54 grams, and the second baggie was approximately 36.5 grams. Photos of the suspected narcotics are pictured below.



8. Based on my training and experience and my conversations with senior law enforcement agents with years of experience investigating narcotics trafficking, I know that a quantity of approximately 90.5 grams of suspected fentanyl is consistent with distribution and is not consistent with personal use.

9. When questioned about the substance, DOLAN stated it was "probably heroin."

10. Elsewhere in the TARGET RESIDENCE, agents found items that, based on my training and experience, constitute some of the tools and paraphernalia commonly used to “cook” or prepare fentanyl or other narcotics and then package them for distribution. Specifically, agents found:

- a. Digital scales.
- b. Plastic sandwich baggies and tubes of a powder suspected to be used as a cutting agent (pictured below):



c. A bag sealer or vacuum sealer (pictured below):



d. A blender (pictured below):



11. I have reviewed DOLAN's computerized criminal history report ("CCH"), which revealed misdemeanor convictions for Fraud, Larceny, Controlled Substances, and Disorderly Person.

CONCLUSION

12. Based on the foregoing, I respectfully submit there is probable cause to believe that on or about March 1, 2022, within the Eastern District of Michigan, defendant Heather DOLAN knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

Respectfully submitted,

By:



George Bingham
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in
my presence and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF MICHIGAN

Date: March 1, 2022